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February 29, 2008

Via ECFS

Ms. Marlene Dortch, Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, SW
Washington, D.C., USA 20554

RE: EB Docket No. 06-36: Annual 47 CFR § 64.2009(e) CPNI Certification

Dear Ms. Dortch:

Enclosed for filing with the Federal Communications Commission ("FCC"), please find the 2007 annual CPNI compliance certification for TELUS Communications Company (TELUS).

If you have any questions regarding the attached CPNI compliance certification, please feel free to contact me at the information above or Erin Emmott at (202) 536-3160, email erin.emmott@telus.com. Thank you for your assistance with this matter.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Janet Yale', with a large, stylized loop at the end.

Janet Yale
Executive Vice President
Corporate Affairs

JY/ee

Attachments

cc: Best Copy and Printing Inc. (via email: fcc@bcpiweb.com)

March Greene, Telecommunications Consumers Division, Enforcement Bureau
(via email: Marcy.Greene@fcc.gov)

TELUS COMMUNICATIONS COMPANY
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 29, 2008

Name of company covered by this certification: TELUS Communications Company

Form 499 Filer ID: 825684

Name of Signatory: Janet Yale

Title of Signatory: Executive Vice President - Corporate Affairs

I, Janet Yale, certify that I am an officer of TELUS Communications Company ("TELUS"), and acting as an agent of TELUS, that I have personal knowledge that TELUS has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, *see* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is a statement explaining how TELUS' procedures ensure that it is in compliance with the requirements set forth in section 64.2001 *et seq* of the Commission's rules.

TELUS has not taken any actions against data brokers in the past year. TELUS also has not uncovered any information regarding the processes pretexters are using to attempt to access the CPNI of TELUS' customers. Maintaining customer privacy is important to us, and TELUS has implemented policies and procedures designed to safeguard CPNI. TELUS also has implemented network security measures, including encryption, to protect the data stored in its system.

TELUS has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Respectfully Submitted,



Janet Yale
EVP - Corporate Affairs
TELUS

TELUS COMMUNICATIONS COMPANY
STATEMENT OF CPNI OPERATING PROCEDURES

TELUS Communications Company ("TELUS") is a telecommunications carrier operating primarily in Canada. TELUS provides telecommunications services, primarily wholesale telecommunications services, to U.S. carriers and U.S. service providers. TELUS also provides service extensions (e.g., private line, frame relay services) to Canadian customers with branch offices in the United States.

TELUS has established policies and procedures to comply with the FCC's rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in title 47, section 64.2001 *et seq.* of the Code of Federal Regulations. These procedures ensure that TELUS is compliant with the FCC's CPNI rules. This statement is a summary of TELUS' policies and procedures designed to safeguard CPNI.

1. TELUS may use, disclose and/or permit access to CPNI relating to U.S. customers and/or the telecommunications services that TELUS provides to customers with locations in the United States for the following purposes:
 - (A) for the provision of the telecommunications services from which such information is derived; or,
 - (B) for the provision of services necessary to, or used in, the provision of such telecommunication service, including the publishing or directories; or,
 - (C) for the following limited purposes:
 - (1) to initiate, render, bill, and collect for telecommunications services;
 - (2) to protect the rights or property of TELUS, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
 - (3) to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves the user of such information to provide such services; and,
 - (4) to the extent applicable, to provide call location information concerning the user of a wireless service:
 - (i) to a public safety answering point ("PSAP"), emergency medical service provider, or emergency dispatch provider, public safety, fire service, or law enforcement official, or hospital emergency or trauma care facility, in order to respond to the user's call for emergency services;
 - (ii) to inform the user's legal guardian or member of the user's immediate family of the user's location in an emergency situation that involves the risk of death or serious physical harm; or
 - (iii) to providers of information or database management services solely for purposes of assisting in the delivery of emergency services in response to an emergency.
2. TELUS does not use CPNI relating to U.S. customers and/or the telecommunications services that TELUS provides to customers located in the United States to conduct outbound marketing or in connection with its sales and marketing campaigns. TELUS also does not disclose or permit access to CPNI relating to U.S. customers and/or the telecommunications services that TELUS provides to customers located in the United States to affiliates or third parties for marketing purposes. TELUS has expressly identified the use, disclosure, or access to CPNI relating to U.S. customers and/or the telecommunication services that TELUS provides to customers located in the United States for marketing purposes as a non-legitimate business purpose.

3. TELUS has implemented privacy and other ethical policies and procedures that restrict and prohibit its personnel from accessing and/or making use of customer data or information, including CPNI, for purposes other than legitimate business purposes.
4. TELUS trains its personnel in relation to these privacy policies and procedures, and, in particular, when personnel are and are not permitted to use CPNI. TELUS has established disciplinary procedures, including and up to termination, for violations of these policies and procedures.
5. TELUS has implemented procedures to authenticate its customers.
6. TELUS has instituted measures to discover and protect against unauthorized attempts to access CPNI. Among other measures, TELUS has adopted implemented internal security procedures and other network security protocols, including, without limitation, encrypting data.
7. TELUS has implemented policies pursuant to which it will track any breaches of CPNI, and will notify the United States Secret Service and the Federal Bureau of Investigation, and its customer (if permitted) upon reasonable discovery of a breach of CPNI. TELUS will maintain a record of such information for a two-year period.
8. TELUS will track customer complaints regarding CPNI.
9. TELUS will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that TELUS has established to safeguard CPNI.